

ORIGINAL

In the United States District Court for the Northern District of Texas

Dallas Division

Jamal Elhaj-Chehade

Co- plaintiff

Vs.

Educational Commission for Foreign Medical Graduates

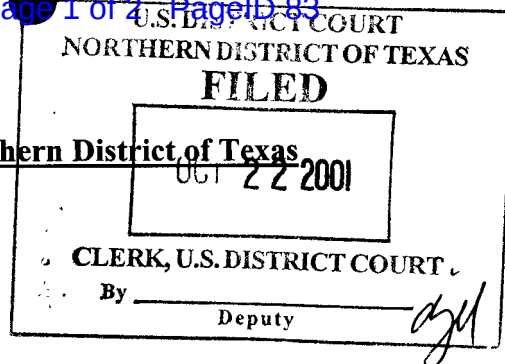
(entities and individuals) defendants

Plaintiff's motion to reopen this case

October 18, 2001

Comes now on this date, October, 18, 2001. the plaintiff is filing his first motion to reopen this case as follow:

- 1- the plaintiff filed his motion to reconsider On January 2001 immediately after the unconstitutional court ruling in this case and the court never replied and the defendants never answered(or the plaintiff was never served of any reply).
 - 2- The USDC court order greatly violate the US Constitution and the supreme Laws of the land. The US Government does allow, endorse or advocate the violation of its supreme laws and no justice officer or judge of sound mind would render any judgment or order that advocate or support such orders unless such judge or person is under the influence, therefore the USDC orders lack the validity.
 - 3- The USDC orders are unconstitutional and violate the due process and the rules of evidence and the protection of the laws and based on fabricated proceeding in favor of the defendants. And the order assumed that the plaintiff does not have the evidence to prove his case. The court must never assume that the plaintiff cannot prove his case.
 - 4- This case must be reopened also because of the new evidences and new developments in this case that give the plaintiff the edge in his claims for the violations that occurred in 1997 and afterward(within the statute of limitation).
 - 5- The case against the defendant is current and that the statute of limitation never run out because the new evidences prove that the defendants did engage in fraud and deception in 1989 and onward , such fraud and deception render the court order invalid, and allow the plaintiff to recover even for actions committed in the 1990 and onward along with other damages.
 - 6- The defendants do have a permanent and life term duty toward the plaintiff, the defendants admitted to such in their charter and publications and aims and mission. Such duty is not subject to change without the plaintiff consent, no matter how many unjustified court orders are entered. the court must hear the evidence in the standard form of civil procedure and in most favor of the plaintiff.
- Wherefore premises considered, the plaintiff prays that upon consideration this court allow for reopening of the case for further consideration.



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Certificate of Service:

This is to certify that a true copy of the foregoing has been deposited in the mail USPS regular mail on the same day as stamped by the clerk to the defendants via their attorney MRS Susan Schwartz at 6688 N. Central Expressway#850, Dallas Texas 75206-3913

GOD Bless America,

Submitted

Dr Jamal Elhaj_chehade , pro-se, IFP

5414 Cedar Springs 3 806

Dallas, Texas 75235

A handwritten signature in black ink, appearing to read 'Dr. Elhaj Chade', with a long horizontal flourish extending to the right.